

**IN THE CIRCUIT COURT OF SHELBY COUNTY, TENNESSEE
FOR THE THIRTIETH JUDICIAL DISTRICT AT MEMPHIS**

PATRICIA ANGE,

Plaintiff,

v.

DOCKET NO: _____

**MEMPHIS ACADEMY OF
HEALTH SCIENCES, and/or
MEMPHIS ACADEMY OF HEALTH
SCIENCES HIGH SCHOOL,**

Defendants.

JURY DEMANDED

PLAINTIFF'S FIRST SET OF INTERROGATORIES TO DEFENDANT

Comes now the Plaintiff, by and through her attorney of record, pursuant to Rule 33 of the Tennessee Rules of Civil Procedure, and propounds to the Defendants, the following Interrogatories to be answered under oath within forty-five (45) days.

Plaintiff propounds the following interrogatories upon statement that:

- (a) The following Interrogatories are continuing in character and, therefore, require the filing by the Defendants of supplemental answers if other, further or different information is secured or available prior to the above-entitled action;
- (b) With respect to each answer to said Interrogatories made by or on behalf of the Defendants, please state the full name, address, title or capacity of the person or person supplying the information or material upon which the answer is based, as well as the source of his, her or their information or material;

(c) Where knowledge, information or possession by the Defendants is requested, such request includes the knowledge and information of, and possession by the Defendants, their present and former agents and employees, and all other persons acting or purporting to act on its behalf, and, unless privileged, its attorneys;

(d) Where the name or identity of a person is requested please state to the extent known his or her full name and present home and business address, and telephone numbers, both now and at the time material to the occurrences giving rise to the matters inquired of. If, after reasonable inquiry, you are unable to ascertain the information requested, please describe the person as completely as possible.

(e) As used herein "your" and "you" means the named Defendants in this case: Memphis Academy of Health Sciences and Memphis Academy of Health Sciences High School and/or "MAHS."

(f) As used herein "plaintiff" means PATRICIA ANGE.

(g) When you are asked to "identify" a document, you are asked to attach a true copy of the document to your answers to these interrogatories without a separately filed request for production. If you decline to so identify the document, you are asked to provide the following information with respect to each document: (1) the identity of the document, including, if appropriate, its date, author, recipient, and general subject matter; (2) the names and addresses of all persons who received or possess copies of the document; (3) the present location of the document; (4) the present custodian of the document.

(h) When you are asked to identify a person, you are asked to state the individual's name, current or last known address, telephone number, and employment, both now and at the time material to the occurrences giving rise to the matters inquired of. If, after reasonable inquiry, you are unable to ascertain the information requested, please describe the person as completely as possible.

(i) As used herein, "include" or "including" means "include but do not limit" or "including but not limited to."

(j) Relevant time period (unless otherwise stated): August 1, 2014 to the present.

INTERROGATORIES

INTERROGATORY NO. 1: Identify the name, address and telephone number of each individual who is responsible for assisting in the preparation of responses to these Interrogatories, and identify each Interrogatory for which each individual assisted in answering and each document relied upon to make said answer.

INTERROGATORY NO. 2: Identify and describe in detail all communications (letters, memos, emails, computer reports, both written and oral) in your custody, control or possession, regarding Plaintiff which are dated anytime from August 1, 2014 to the present, which concern Plaintiff's job performance, the student ACT scores, or any issues raised by Plaintiff in her Complaint or by Defendants in their Answer.

INTERROGATORY NO. 3: Identify any and all persons whom you believe have personal knowledge of the factual allegations set forth by Plaintiff in her Complaint; and/or have personal knowledge of the ACT tests administered at MAHS during the relevant time period, including the test results; and/or have personal knowledge of how and why Dr. Williams was terminated by MAHS; and/or have personal knowledge of the financial records maintained by MAHS or Corey Johnson or any employee of Defendants, concerning funds allocated for ACT testing, incentives, bonuses and/or raises to faculty.

INTERROGATORY NO. 4: Identify and describe in detail the factual basis for each affirmative defense Defendants assert in their Answer(s) to this civil action, and identify each document Defendants contend constitutes evidence of or provides support for each affirmative defense Defendants assert in their Answer(s) to this civil action.

INTERROGATORY NO. 5: Please state whether any photographs, motion pictures, audio tapes, or video tapes and/or video stills were taken of the Plaintiff, or any person or thing relevant to the issues in this matter, including but not limited to the Board meeting held on October 14, 2018, and/or Plaintiff being escorted out of the school at any time, and, if so, state when and where they were taken, the present location of the photographs, motion pictures, audio tapes or video tapes and/or video stills, the name and address of the person making said recording(s), and the name and address of the custodian of said recordings.

If any videos cameras as requested herein were operating and recording but said tapes(s) is no longer available for any reason, please state:

- (a) Describe the area covered by the video cameras;
- (b) Reason why tape(s) are no longer available;
- (c) Custodian with responsibilities to maintain and safeguard the tape(s); and
- (d) Date Defendants learned that said tape(s) were destroyed or lost.

INTERROGATORY NO. 6: Identify any and all persons who have given statements or have made any allegations regarding Plaintiff's Complaint or your defenses thereto; Include in your response the substance of said statement, the date given, where it was made and to whom it was given; If you assert attorney-client privilege, then state the date, where it was made, and to whom it was given.

INTERROGATORY NO. 7: Identify any expert witnesses you anticipate calling to testify at the trial of this cause, either live or via deposition. With respect to each such person, state the name, address, and profession of each person you expect to call as an expert at trial; the subject matter on which each expert is expected to testify; and the substance of the facts and opinions to which the expert is expected to testify and a summary of the grounds for each opinion.

INTERROGATORY NO. 8: Please identify all persons who acted as principal, co-principal or acting principal of MAHS following the departure of Dr. Reginald ("Doc") Williams.

INTERROGATORY NO. 9: Please identify the person or persons who held the funds donated in October 2018 for ACT tests for Spring 2019; and identify the custodian of the books and records concerning said funds.

INTERROGATORY NO. 10: Please identify the staff person referred to in Plaintiff's Complaint, ¶21, and/or ¶17.

INTERROGATORY NO. 11: Please identify each and every security officer who worked at MAHS on October 31, 2018, and on November 5, 2018.

INTERROGATORY NO. 12: For academic years 2018-2019, 2017-2018, and 2016-2017, identify the officers of the MAHS Board, and their titles.

INTERROGATORY NO. 13: Identify each and every person who was hired to replace Plaintiff, or who was re-assigned to cover Plaintiff's duties, for the remainder of academic year 2018-2019, and 2019-2020.

Respectfully submitted,

KATHLEEN CALDWELL, PLLC



By: _____

Kathleen L. Caldwell, #9916
2670 Union Avenue Ext., Suite 110
Memphis, TN 38112
Telephone: (901) 458-4035
Facsimile: (901) 458-4037
Attorney for Plaintiff
kathleencaldwell.attorney@gmail.com

**IN THE CIRCUIT COURT OF SHELBY COUNTY, TENNESSEE
FOR THE THIRTIETH JUDICIAL DISTRICT AT MEMPHIS**

PATRICIA ANGE,

Plaintiff,

v.

DOCKET NO: _____

**MEMPHIS ACADEMY OF
HEALTH SCIENCES, and/or
MEMPHIS ACADEMY OF HEALTH
SCIENCES HIGH SCHOOL,**

Defendants.

JURY DEMANDED

**COMPLAINT FOR WRONGFUL DISCHARGE, FOR ACTION PURSUANT
TO TENN. CODE ANN. §50-1-304, AND FOR PROMISSORY ESTOPPEL,
FOR COMPENSATORY DAMAGES AND OTHER RELIEF**

This is an action brought by Patricia Ange against a Tennessee Charter School, namely the Memphis Academy of Health Sciences High School and/or Memphis Academy of Health Sciences, for wrongful discharge, for promissory estoppel, and for an action pursuant to Tenn. Code Ann. §50-1-304, and states:

I. PARTIES

1. Plaintiff Patricia Ange is an adult resident citizen of Memphis Shelby County, Tennessee, who resides at 1425 Whiting Street, Memphis, TN 38117.
2. Defendant, Memphis Academy of Health Sciences, is a domestic non-profit corporation organized and existing under the laws of the State of Tennessee, which may be reached with service of process by serving its registered agent, Corey Johnson, 3608 Hawkins Mill Road, Memphis, TN 38128-2039.

3. Defendant, Memphis Academy of Health Sciences High School, is a domestic non-profit corporation organized and existing under the laws of the State of Tennessee, which may be reached with service of process by serving its registered agent, Corey D. Johnson, 3925 Chelsea Avenue Ext., Memphis, TN 38108-2612.

II. JURISDICTION AND VENUE

4. This Court has jurisdiction over the subject matter raised in this Complaint.

5. Venue is appropriate in this district.

III. FACTS

6. In early June 2015, Plaintiff Patricia Ange was hired by Memphis Academy of Health Sciences (“MAHS”) to teach testing/preparation techniques to secondary students. In particular Ms. Ange was to handle all aspects of administering the ACT tests to students at the MAHS High School. Her duties included grant-writing and fund raising, as well as teaching the academic seminar. The goal was to equip MAHS students to perform better on the ACT tests and to equip students so as to enhance their abilities to get into colleges of their choice.

7. MAHS is a non-profit domestic corporation operating a Charter School as defined by Tenn. Code Ann. §49-13-101 *et seq.* MAHS and MAHS High School appear to be synonymous entities; both have the same registered agent. Both are active corporations. Both operate the Charter School commonly referred to as Memphis Academy of Health Sciences High School. Plaintiff therefore refers to said entities as: “MAHS.” “The Board” of MAHS is a single entity.

8. MAHS owns and operates a Charter School pursuant to Tenn. Code Ann. §49-13-101 et seq. A Charter School is a public school operated by independent, non-profit governing bodies, pursuant to an agreement with a chartering authority, in this case the Shelby County School System. See, §49-13-104(5) for definition of “chartering authority.”

9. Defendants herein own and operate the Charter School, and hire and fire teachers and administrators for its school(s): MAHS.

10. For academic year 2015-2016, Ange undertook her duties with zeal. She requested funds to allow MAHS students to take the ACT test more than one time. She established incentives, to encourage her students. She was successful during her first year and received a nominal raise at the end of her first academic year.

11. By the following academic year (2016-2017) her program began demonstrating marked improvement on her students’ ACT scores. She continued to seek resources and school funding through communications with Dr. Williams, her principal, Corey Johnson, the Executive Director and Tiffany Adams, Director of Communications/Media Relations to raise money to provide for additional tests and additional incentives. She asked for a raise, which was denied. She asked for assistance with grant writing, which was denied.

12. Plaintiff knew that one key to success in test scores was for students to take the test more often than one or two times per calendar school year. By the Spring semester 2017, she observed outstanding student growth on the ACT test,

and on the 2017 EOC test in English, which also increased due to the testing practices taught by Plaintiff.

13. In Spring 2018, Plaintiff was offered a job elsewhere, for a higher salary, guaranteed bonuses, and guaranteed incentive monies. She advised MAHS of the offer. She was then offered additional funds for her to stay at MAHS for a third year. While the salary offer was still less than what the other school would have paid, Plaintiff agreed to stay at MAHS. In particular, she was promised by MAHS that she would have about \$5,000.00 for additional tests, and more funding for another round of tests in December and in Spring of 2019; that she would have additional “incentives” (candy, chips, etc.); and that she herself would be eligible for bonuses, if she showed continued student achievement on the ACT test scores. She relied on these representations. Her reliance was reasonable. As a proximate result of her reliance on these representations, she changed her plans and agreed to try for academic year 2019-2019.

14. But by September 2018 (the start of academic year 2018-2019), following the unexpected termination of Dr. Reginald (“DOC”) Williams, principal of MAHS, Plaintiff was told she had to obtain permission in advance on all incentive programs. That had never been true previously.

15. Her insurance and sick pay plans were changed, despite contracts having already been signed for the academic year.

16. Plaintiff’s mentor, Dr. Williams, had been unexpectedly terminated at the start of academic year 2018-2019. Plaintiff was devastated. Following the departure of Dr. Williams, turmoil became commonplace at the school. There were

incidents of students fighting, drug use, smoke/stink bombs being set off, and employee turnover. There was no clear chain of authority. No one person replaced Dr. Williams.

17. Plaintiff understood the school was in crisis. She attended the MAHS Board meeting on October 16, 2018 because of her concerns. Reverend Corey Johnson denied at the Board meeting that there had been fights at the school. Plaintiff showed him (and the others present) a picture of her eye, which had been hurt when she broke up a fight (one of several). Plaintiff had already sent the picture to Human Resources, and had filed a Workers' Compensation claim as well. Plaintiff further addressed her concerns that Reverend Corey Johnson had hit a female staff person so hard she was knocked to the floor, while on a trip to Washington, D.C. Two other staff members had witnessed the assault.

18. Immediately following the October Board meeting, Plaintiff found herself ostracized. Other faculty avoided her. Plaintiff in early November needed to get her students signed up for the December ACT test. She began asking for the funds, and received no response. Eventually Plaintiff borrowed funds from a family member, to avoid letting her students down. This loan was to be used exclusively for seniors. The December test was important to each of the students, especially the seniors.

19. Plaintiff by attending the MAHS Board meeting on October 16, 2018, was seeking to inform the Board and others present that MAHS was in chaos, that the students were out of control, that the administrators were acting arbitrarily and harshly towards faculty members, that funds intended to pay ACT fees for students

were being diverted and/or misspent and that the faculty had been misled about the reasons for Dr. Williams' departure.

20. The retaliatory actions taken by MAHS against Plaintiff began immediately following the October 16 Board meeting. See ¶¶17-19 above. The first time Plaintiff was ordered to leave the campus was within 15 days of the Board meeting (See ¶21 below). And within two weeks of the Board meeting, Plaintiff was terminated, without cause.

21. On October 31, 2018, the staff person who had been attacked by Reverend Corey Johnson (Executive Director of MAHS) came to Plaintiff at the end of the school day and wanted Plaintiff to essentially keep her name out of any issues with Reverend Johnson. The staff person disparaged Ms. Ange, and when Plaintiff tried to get an administrator to come to her room, Ms. Ange attempted to call Corey Johnson, who did not pick up the call. Plaintiff then went in search of an administrator and asked the staff member to wait until she returned. The staff member fled the building. When Ms. Ange found Ms. Garrett, the co-principal at the time, and told her what had happened, Ms. Ange returned to her classroom. Ms. Garrett then showed up at Ms. Ange's room with a resource officer (security), who told Plaintiff to immediately leave the campus and escorted her off campus in front of students who were outside following the day's dismissal.

22. The funds borrowed from Plaintiff's family member were misspent. Debit cards were purchased with said funds by MAHS to pay for the juniors' ACT tests, which was not what the funds were intended for. Those funds were intended for the senior ACT tests for Spring 2019. Additionally, they could not be used fully.

Left over funds could not be re-loaded or transferred. Plaintiff ended up personally paying for tests to be taken by seniors (for Spring 2019).

23. Just days following Ms. Ange's attempt at registering her students for the December test, Plaintiff was told on or about Friday, November 2, 2018, that she was being terminated. The (purported) reason given to Plaintiff: she had disclosed confidential information about a student. Plaintiff asked which student, and the administrator (Ms. Whitney Evans) refused to answer. Evans placed a phone call to determine if she could provide Ms. Ange with that information. Following the phone call Evans refused to answer Plaintiff's questions. Plaintiff was again escorted by security from the building without being given any documentation of or factual reasons for her termination, and she had to leave without her personal belongings.

24. Plaintiff was not given a reasonable opportunity to retrieve her personal belongings.

25. On the following Monday, on or about November 5, 2018, Plaintiff received a letter of termination with a new (purported) reason: "professional misconduct." Plaintiff repeatedly requested the Board to explain what she had done, and they never replied or allowed her to appeal the decision. Corey Johnson had lied to Plaintiff repeatedly. He deceived her. He led her to believe he would pay for the incentives, bonuses, the extra tests, and would fight to give her a raise based upon increased test scores. Plaintiff relied on said representations to her detriment. Her reliance was reasonable. Plaintiff had exceeded expectations, and relied on Corey Johnson's representations to her detriment. Corey Johnson knew Plaintiff had a better job offer. He knew by the Summer of 2018 that Dr. Williams was being

terminated. He allowed Plaintiff to rely on empty promises, to change her plans, to her detriment.

26. Plaintiff has suffered the following injuries and damages:

- A. Damage to her professional reputation and career;
- B. Embarrassment and humiliation;
- C. Loss of income;
- D. Sleeplessness;
- E. Anxiety;
- F. Depression;
- G. Guilt over the impact on her students as a result of her termination;
- H. Grief for herself and for her students;
- I. Shame;
- J. Worry;
- K. Episodes of crying and
- L. Family discord.

IV. CAUSES OF ACTION

27. Plaintiff repeats and incorporates the allegations in Paragraph 1 through 26 of her Complaint as if fully set forth herein, and for causes of action states as follows:

28. Based on the foregoing facts, Plaintiff states a cause of action against MAHS for wrongful discharge.

29. Based on the foregoing facts, Plaintiff states a cause of action against MAHS as a whistleblower, pursuant to Tenn. Code Ann. 50-1-304. The Tennessee

Public Protection Act (“TPPA”) prohibits retaliation for reporting unlawful conduct. Tenn. Code Ann. §50-1-304 et seq. Plaintiff reported incidents of fights and acts of violence by students to the MAHS Board. She reported fiscal irregularities/malfeasance to the MAHS Board. She further reported substantial changes in sick leave and insurance benefits, after contracts had been signed. She reported the assault on a female staff member by the Executive Director, Corey Johnson, said assault was witnessed by the MAHS Board President, Michael Dexter, and others. The retaliation by MAHS was immediate. She was ordered to leave the campus. She was shortly thereafter (approximately two weeks) terminated. MAHS is subject to the policies and standards of the Shelby County School System, which has a policy in effect at all relevant times that a whistleblower may file a civil suit against the school system pursuant to the TPPA. Thus Plaintiff asserts that said policy is likewise binding on MAHS, its Board and its administrators.

30. Based on the foregoing facts, Plaintiff states a cause of action against MAHS for promissory estoppel.

31. Plaintiff seeks award of compensatory damages for these causes of action, and all other relief to which she may be entitled, including award of attorney’s fees and litigation costs.

V. DEMAND

Based on the foregoing, Plaintiff demands:

1. That proper process issue, requiring Defendants to answer under oath within the time allowed by law;
2. Award of her compensatory damages in the amount of \$350,000.00;

3. Award of all further relief as may be appropriate, including award of her attorney's fees and court costs; and
4. Jury demanded.

Respectfully submitted,

KATHLEEN CALDWELL, PLLC



By: _____

Kathleen L. Caldwell, #9916
2670 Union Avenue Ext., Suite 110
Memphis, TN 38112
Telephone: (901) 458-4035
Facsimile: (901) 458-4037
Attorney for Plaintiff
kathleencaldwell.attorney@gmail.com

**IN THE CIRCUIT COURT OF SHELBY COUNTY, TENNESSEE
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DOCKET NO: _____

**MEMPHIS ACADEMY OF
HEALTH SCIENCES, and/or
MEMPHIS ACADEMY OF HEALTH
SCIENCES HIGH SCHOOL,**

Defendants.

JURY DEMANDED

**PLAINTIFF'S FIRST REQUESTS FOR PRODUCTION
OF DOCUMENTS TO DEFENDANT**

Comes now Plaintiff, by and through her counsel of record, pursuant to Rule 34 of the Tennessee Rules of Civil Procedure, and propounds to the Defendants, the following Requests for Production to be responded to within forty-five (45) days.

I. DEFINITIONS.

Please produce the following:

A. As used in the below-numbered requests, the terms "document" or "documents" are used in their broad sense, to the full extent permitted by the Tennessee Rules of Civil Procedure, to mean without limitation any original written, recorded, filmed, or graphic matter of every type and description, whether produced or reproduced on paper, cards, tapes, film, electronic facsimile, computer storage disks, tapes, or devices, or any other media, including electronic data; electronic mail; data in any information management system, including indexes to databases;

databases themselves, including all records and field and structural information contained therein; logs of activity on any computer that may have processed or stored electronic data containing litigation information; word-processing files and file fragments; data created by financial, accounting, billing and spread-sheet programs; files and file fragments from electronic calendars and scheduling programs, that is in the possession, control, or custody of the Defendants or their present or former attorneys, agents, or representatives, and each copy of each such writing, record, electronic data, film, or graphic matter that is different in any way from the original or where such copy contains any commentary or notation whatsoever that does not appear on the original, whether by interlineations, receipt stamp notation, indication of copies sent or received, inclusion of comments or notations, or otherwise, and drafts. It specifically includes by way of illustration, but not by way of limitation, all letters, notes, diaries, reports studies, charts, graphs, memoranda, instruments, minutes, ledgers, records, recordings, tapes, microfilm, photographs, correspondence, telegrams, diaries, bookkeeping entries, financial statements, tax returns, checks, check stubs, notebook statements, affidavits, agreements, electronic data, applications, books, pamphlets, periodicals, appointment calendars, work papers, etc.

B. In the event either Defendant objects or declines to produce any document requested herein on the basis of a claim of privilege or work product protection, or on any other grounds, including relevancy, please identify and describe all such documents not produced (by date, author, addressee, signatory, subject matter, and length); state the privilege relied upon or the grounds for the objection interposed

and the facts supporting such privilege or objection; and identify all persons who have or had access to or received a copy of the documents or any portions thereof.

C. If any documents requested herein are unavailable because they have been destroyed or lost, identify which documents were destroyed or lost (by date, author, addressee, signatory, subject matter, and length); state when the documents were destroyed or lost and why or how; and state further the identify of any persons who may have ordered the documents destroyed together with the reasons for their destruction, and any person who participated in the destruction.

D. These requests are continuing in nature. If, after responding to the requests, Defendants obtain or become aware of any further documents responsive to these requests, a supplementary response is required.

E. Definitions: "MAHS" means Memphis Academy of Health Sciences, and/or Memphis Academy of Health Sciences High School.

REQUESTS FOR PRODUCTION OF DOCUMENTS

REQUEST NO. 1: Any and all documents which support, evidence, relate or otherwise pertain to any and all personnel policies, manuals, programs, and training materials of Defendants in effect during Plaintiff's employment during 2014 to 2018, including but not limited to:

- (a) employee disciplinary policies, including but not limited to, counseling, written warnings, suspension, demotion and termination policies;
- (e) any and all policies regarding commissions and salaries, raises, bonuses, retirement accounts, and any other benefits relative to persons in the position/rank held by Plaintiff;
- (f) all document retention/destruction policies regarding hard copies of documents as well as electronic data and videotapes and other recordings; and

REQUEST NO. 2: Any and all documents relating to the events involving Plaintiff as alleged in her Complaint, including:

- (a) written statements of witnesses (current and past employees);
- (b) notes of interviews with witnesses (current and past employees);
- (c) tape recordings or surveillance videos of any and all oral statements and/or interviews of witnesses (current and past employees);
- (d) any and all transcriptions of any tape recordings, or surveillance video clips, any and all oral statements and/or interviews of witnesses (current and past employees);
- (e) any and all reports regarding the results of any and all investigations (current and past employees);
- (f) any and all correspondence received from or sent to Plaintiff by MAHS, its directors, managers and supervisors;
- (g) any and all correspondence and/or reports received from or sent to the Defendants concerning Plaintiff during the relevant time period 2014 to 2018;
- (h) any and all documents relating to or evidencing discussions between Plaintiff and Defendants and/or its employees, (current and past employees) concerning Plaintiff's job performance;
- (i) any and all documents relating to or evidencing discussions between Defendants and any person, other than Defendants' counsel, regarding Patricia Ange, her job performance and/or the events specifically alleged in her Complaint; and
- (j) any and all documents received from or sent to any person, other than Defendants' counsel, regarding Patricia Ange during the course of her employment.

REQUEST NO. 3: Produce each and every organizational chart for MAHS for academic school year 2018-2019; 2017-2018; 2016-2017.

REQUEST NO. 4: Produce Plaintiff's personnel file(s), including but not limited to: (2014 to 2018), her evaluations, any disciplinary write-ups, any

communications (memos, etc.), commendations, raises, her application for employment, hiring decision, termination, and/or resignations. This request includes any files maintained by the HR office and/or by any of her supervisors, the Executive Director, or the Board.

REQUEST NO. 5: Produce Plaintiff's payroll records, and records for each and every benefit, including bonuses, raises, pension, retirement, 401-K, profit-sharing or any other post employment benefits such as major medical insurance, etc.

REQUEST NO. 6: Produce personnel file(s), including but not limited to: (2014 to 2018), their evaluations, any disciplinary write-ups, any communications (memos, etc.), commendations, raises, application for employment, hiring decision, termination, and/or resignations, for the following:

(a) Corey Johnson, (b) Tiffany Adams, (c) Reginald ("Doc") Williams, (d) Talya Garrett, (e) Whitney Evans (f) Anita McNeil, (g) Michael Miles, (h) Sophia Hardy, (i) Joyce Niter, and (j) any person who was assigned to work with students on their ACT test performance for years 2018-2019 and to the present.

This request includes any files maintained by the HR office and/or by any of their supervisors, the Executive Director, or the Board.

REQUEST NO. 7: Produce all incident reports, concerning fights between students, and fights broken up by faculty or staff for: academic year 2018-2019; and academic year 2017-2018.

REQUEST NO. 8: Produce any and all pictures, videos and other recordings in your possession or in the possession of any agent or third party, which you have identified in response to Interrogatory No. 5.

REQUEST NO. 9: Produce any and all documents you have identified in response to Interrogatory No. 2.

REQUEST NO. 10: Produce the financial records which reflect funds contributed toward ACT testing for all three academic years at issue in this case, including the check register, or the receipt reflecting purchase of debit cards, and any other documents evidencing that said debit cards were "cashed out," the date(s) thereof, and the identity of the person who cashed out said debit cards.

REQUEST NO. 11: Produce the student ACT scores for all academic years, starting in 2011-2012 to the present, and include all composite graphs or other documents evidencing whether the MAHS scores had increased from one year to the next, or decreased.

Respectfully submitted,

KATHLEEN CALDWELL, PLLC



By:

Kathleen L. Caldwell, #9916
2670 Union Avenue Ext., Suite 110
Memphis, TN 38112
Telephone: (901) 458-4035
Facsimile: (901) 458-4037
Attorney for Plaintiff
kathleencaldwell.attorney@gmail.com

(CIRCUIT/CHANCERY) COURT OF TENNESSEE
140 ADAMS AVENUE, MEMPHIS, TENNESSEE 38103
FOR THE THIRTIETH JUDICIAL DISTRICT AT MEMPHIS

ELECTRONICALLY FILED
2019 Sep 16 3:18 PM
CLERK OF COURT

SUMMONS IN CIVIL ACTION

Lawsuit
 Divorce

Docket No. _____

Ad Damnum \$ _____

PATRICIA ANGE

VS

MEMPHIS ACADEMY OF HEALTH SCIENCES, and/or MEMPHIS ACADEMY OF HEALTH SCIENCES HIGH SCHOOL

Plaintiff(s)

Defendant(s)

TO: (Name and Address of Defendant (One defendant per summons))

Memphis Academy of Health Sciences
By Serving Its Registered Agent:
Corey Johnson
3608 Hawklns Mill Road
Memphis, TN 38128-2039

Method of Service:

- Certified Mail
- Shelby County Sheriff
- Commissioner of Insurance (\$)
- Secretary of State (\$)
- Other TN County Sheriff (\$)
- Private Process Server
- Other

(\$) Attach Required Fees

You are hereby summoned and required to defend a civil action by filing your answer with the Clerk of the Court and

serving a copy of your answer to the Complaint on Kathleen L. Caldwell

Plaintiff's

attorney, whose address is 2670 Union Avenue Ext., Suite 110, Memphis, TN 38112

telephone (901) 458-4035 within THIRTY (30) DAYS after this summons has been served upon you, not including the day of service. If you fail to do so, a judgment by default may be taken against you for the relief demanded in the Complaint.

TEMIKA D. GIPSON, Clerk / DONNA RUSSELL, Clerk and Master

TESTED AND ISSUED _____ By _____, D.C.

TO THE DEFENDANT:

NOTICE: Pursuant to Chapter 919 of the Public Acts of 1980, you are hereby given the following notice:

Tennessee law provides a ten thousand dollar (\$10,000) personal property exemption from execution or seizure to satisfy a judgment. If a judgment should be entered against you in this action and you wish to claim property as exempt, you must file a written list, under oath, of the items you wish to claim as exempt with the Clerk of the Court. The list may be filed at any time and may be changed by you thereafter as necessary; however, unless it is filed before the judgment becomes final, it will not be effective as to any execution or garnishment issued prior to the filing of the list. Certain items are automatically exempt by law and do not need to be listed. These include items of necessary wearing apparel (clothing) for yourself and your family and trunks or other receptacles necessary to contain such apparel, family portraits, the family Bible and school books. Should any of these items be seized, you would have the right to recover them. If you do not understand your exemption right or how to exercise it, you may wish to seek the counsel of a lawyer.

FOR AMERICANS WITH DISABILITIES ACT (ADA) ASSISTANCE ONLY, CALL (901) 222-2341

I, TEMIKA D. GIPSON / DONNA RUSSELL, Clerk of the Court, Shelby County, Tennessee, certify this to be a true and accurate copy as filed this

20 _____

TEMIKA D. GIPSON, Clerk / DONNA RUSSELL, Clerk and Master By: _____, D.C.

RETURN OF SERVICE OF SUMMONS

I HEREBY CERTIFY THAT I HAVE SERVED THE WITHIN SUMMONS:

By delivering on the _____ day of _____, 20____ at _____ M. a copy of the summons
and a copy of the Complaint to the following Defendant _____
at _____

By: _____

Signature of person accepting service

Sheriff or other authorized person to serve process

RETURN OF NON-SERVICE OF SUMMONS

I HEREBY CERTIFY THAT I HAVE NOT SERVED THE WITHIN SUMMONS:

To the named Defendant _____
because _____ is (are) not to be found in this County after diligent search and inquiry for the following
reason(s): _____

This _____ day of _____, 20_____.

By: _____

Sheriff or other authorized person to serve process



The Shelby County, Tennessee Circuit Court

Case Style: PATRICIA ANGE VS MEMPHIS ACADEMY OF HEALTH SCIENCE

Case Number: CT-4102-19

Type: SUMMONS ISSD TO MISC



Ms Sheri C Carter, DC

Electronically signed on 09/17/2019 08:36:10 AM

(CIRCUIT/CHANCERY) COURT OF TENNESSEE
140 ADAMS AVENUE, MEMPHIS, TENNESSEE 38103
FOR THE THIRTIETH JUDICIAL DISTRICT AT MEMPHIS

ELECTRONICALLY FILED
2019 Sep 16 3:18 PM
CLERK OF COURT

SUMMONS IN CIVIL ACTION

Docket No. _____

<input checked="" type="radio"/> Lawsuit
<input type="radio"/> Divorce

Ad Damnum \$ _____

PATRICIA ANGE

VS

MEMPHIS ACADEMY OF HEALTH SCIENCES, and/or MEMPHIS ACADEMY OF HEALTH SCIENCES HIGH SCHOOL

Plaintiff(s)

Defendant(s)

TO: (Name and Address of Defendant (One defendant per summons))

Memphis Academy of Health Sciences High School
By Serving Its Registered Agent:
Corey D. Johnson
3925 Chelsea Avenue Ext.
Memphis, TN 38108-2612

Method of Service:

- Certified Mail
- Shelby County Sheriff
- Commissioner of Insurance (\$)
- Secretary of State (\$)
- Other TN County Sheriff (\$)
- Private Process Server
- Other

(\$) Attach Required Fees

You are hereby summoned and required to defend a civil action by filing your answer with the Clerk of the Court and

serving a copy of your answer to the Complaint on Kathleen L. Caldwell

Plaintiff's

attorney, whose address is 2670 Union Avenue Ext., Suite 110, Memphis, TN 38112

telephone (901) 458-4035 within THIRTY (30) DAYS after this summons has been served upon you, not including the day of service. If you fail to do so, a judgment by default may be taken against you for the relief demanded in the Complaint.

TEMIKA D. GIPSON, Clerk / DONNA RUSSELL, Clerk and Master

TESTED AND ISSUED _____ By _____, D.C.

TO THE DEFENDANT:

NOTICE: Pursuant to Chapter 919 of the Public Acts of 1980, you are hereby given the following notice:

Tennessee law provides a ten thousand dollar (\$10,000) personal property exemption from execution or seizure to satisfy a judgment. If a judgment should be entered against you in this action and you wish to claim property as exempt, you must file a written list, under oath, of the items you wish to claim as exempt with the Clerk of the Court. The list may be filed at any time and may be changed by you thereafter as necessary; however, unless it is filed before the judgment becomes final, it will not be effective as to any execution or garnishment issued prior to the filing of the list. Certain items are automatically exempt by law and do not need to be listed. These include items of necessary wearing apparel (clothing) for yourself and your family and trunks or other receptacles necessary to contain such apparel, family portraits, the family Bible and school books. Should any of these items be seized, you would have the right to recover them. If you do not understand your exemption right or how to exercise it, you may wish to seek the counsel of a lawyer.

FOR AMERICANS WITH DISABILITIES ACT (ADA) ASSISTANCE ONLY, CALL (901) 222-2341

I, TEMIKA D. GIPSON / DONNA RUSSELL, Clerk of the Court, Shelby County, Tennessee, certify this to be a true and accurate copy as filed this

20 _____

TEMIKA D. GIPSON, Clerk / DONNA RUSSELL, Clerk and Master By: _____, D.C.

RETURN OF SERVICE OF SUMMONS

I HEREBY CERTIFY THAT I HAVE SERVED THE WITHIN SUMMONS:

By delivering on the _____ day of _____, 20____ at _____ M. a copy of the summons
and a copy of the Complaint to the following Defendant _____
at _____

By: _____

Signature of person accepting service

Sheriff or other authorized person to serve process

RETURN OF NON-SERVICE OF SUMMONS

I HEREBY CERTIFY THAT I HAVE NOT SERVED THE WITHIN SUMMONS:

To the named Defendant _____
because _____ is (are) not to be found in this County after diligent search and inquiry for the following
reason(s): _____

This _____ day of _____, 20_____.

By: _____

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